

William N. Sinclair (SBN 222502)
(bsinclair@mdattorney.com)
Steven D. Silverman (Admitted *Pro Hac Vice*)
(ssilverman@mdattorney.com)
Stephen G. Grygiel
(sgrygiel@ mdattorney.com)
Phillip J. Closius (Admitted *Pro Hac Vice*)
(pclosius@ mdattorney.com)
Alexander Williams (Admitted *Pro Hac Vice*)
awilliams@mdattorney.com

a.williams@midattorney.com
SILVERMAN THOMPSON SLUTKIN WHITE LLC

201 N. Charles Street, Suite 2600
Baltimore, MD 21201
Telephone: (410) 385-2225
Facsimile: (410) 547-2432

Thomas J. Byrne (SBN 179984)
(tbyrne@nbolaw.com)
Mel T. Owens (SBN 226146)
(mowens@nbolaw.com)
NAMANNY BYRNE & OWENS, P.C.
2 South Pointe Drive, Suite 245
Lake Forest, CA 92630
Telephone: (949) 452-0700
Facsimile: (949) 452-0707

Stuart A. Davidson (Admitted *Pro Hac Vice*)
(sdavidson@rgrdlaw.com)
Mark J. Dearman (Admitted *Pro Hac Vice*)
(mdearman@rgrdlaw.com)
Janine D. Arno (Admitted *Pro Hac Vice*)
(jarno@rgrdlaw.com)

**ROBBINS GELLER RUDMAN
& DOWD LLP**

120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: (561) 750-3000
Facsimile: (561) 750-3364

Attorneys for Plaintiffs

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ETOPIA EVANS, *et al.*

Civil Case No.:3:16-CV-01030-WHA

Plaintiffs.

V

ARIZONA CARDINALS FOOTBALL CLUB,
LLC, et al.,

Defendants.

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME TO
FILE DECLARATIONS IN SUPPORT OF
SEALING PURSUANT TO CIVIL LOCAL
RULE 79-5(e)(1)**

Pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, the parties respectfully submit this joint stipulation to extend time to file any declaration required by Civil L.R. 79-5(e)(1) establishing that certain designated material associated with Defendants' Motion to Dismiss/for Summary Judgment ("Motion") is sealable.

WHEREAS, Defendants filed their Motion on March 15, 2017 [See Dkt. No. 190-3];

WHEREAS, any declaration in support of sealing is due by March 20, 2017;

WHEREAS, Plaintiffs had previously requested for, and Defendants agreed to, an extension of time through and including March 17 to state whether they would keep portions of their deposition transcripts as confidential and through March 31 to identify those portions of their transcripts;

WHEREAS, the parties had also previously agreed that they would keep any health-related information as confidential until it was filed with the Court, at which time Plaintiffs would evaluate whether such information had already been made public and thus was not deserving of confidentiality protection, a process that the parties agreed alleviated a tremendous amount of work for Plaintiffs, who otherwise would have to go through the thousands of pages of documents and transcripts in this matter that might contain health-related information, compare it against what has already been made public, and then, if not already public, determine whether there was cause to keep it confidential;

WHEREAS, the information currently under seal, may contain health-related information;

WHEREAS, it would be a tremendous amount of work for Plaintiffs' counsel to review the many filings associated with Defendants' Motion (including 35 exhibits), share that information with 12 different Plaintiffs, and reach decisions regarding confidentiality within four days;

WHEREAS, the requested extension should not cause any prejudice, as Plaintiffs' response is not due until March 29 and there is nothing else currently pending with the Court;

WHEREAS, Plaintiffs are mindful of the Court's view on sealing and would seek to keep sealed only that which is deserving, and that having more time will give Plaintiffs a better ability to do so:

NOW THEREFORE, THE PARTIES BY COUNSEL HEREBY STIPULATE as follows:

The deadline to file any declaration in support of sealing pursuant to Local Rule 79-5(e)(1) is extended from March 20, 2017 until March 27, 2017.

1 DATED: March 16, 2017

SILVERMAN|THOMPSON|SLUTKIN|WHITE|LLC

2 By: /s/ William N. Sinclair
3 William N. Sinclair (SBN 222502)

4 Attorneys for Plaintiffs

5 COVINGTON & BURLING LLP

6 By: /s/ Benjamin C. Block
7 Benjamin C. Block (*pro hac vice*)
8 bblock@cov.com
9 COVINGTON & BURLING LLP
One CityCenter
850 Tenth St., NW
Washington, DC 20001-4956
Tel: (202) 662-5205
Fax: (202) 778-5205

12 Attorneys for Defendants

15 **SIGNATURE ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)(3)**

16 Undersigned attests that concurrence in the filing of the document to which this attestation is
17 attached has been obtained from each signatory whose conformed signature appears thereon.

18 By: /s/ William N. Sinclair
William N. Sinclair (SBN 222502)

19 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

21 The deadline for any interest party to file any declaration in support of sealing pursuant to Local
Rule 79-5(e)(1) is extended from March 20, 2017 until March 27, 2017.

23 DATED: March ___, 2017

24 _____
25 THE HONORABLE WILLIAM ALSUP
26 UNITED STATES DISTRICT JUDGE